

## Remarks

In order to advance this case to allowance and issuance, the specific newly added references in the detailed description to the Towery et al. patent 5,574 and to Figs. 24, 25 and 30 of the Alfaro patent 6,296,343 have been deleted. However such references were deemed to be inherent in the original specification, drawings and claims, and are not believed to constitute "new matter". The amendment makes the matter moot. Since all the other amendments in the Substitute Specification are fully supported by and consistent with the original specification, drawings and claims as understood by one skilled in the art, favorable approval of such Substitute Specification (as presently amended) is earnestly solicited.

Also the Examiner is requested to approve the previously submitted drawing changes which contain no new matter. Applicants will then submit corrected formal drawings.

The Examiner has rejected claim 2 under Section 112 because of the use of the phrase "narrowing pattern". In order to advance this case to allowance and issuance, the word "pattern" has been deleted and the related term "narrowing process" which appeared in the original specification (see also the reference to "narrow process" in original Fig. 5, and in Fig. 25 of the newly added parent Alfaro patent 6,296,343) has been substituted. Favorable reconsideration and withdrawal of the Section 112 rejection is respectfully requested.

Claims 1, 3 and 4 stand rejected under 35 USC 102(b) as being anticipated by Towery et al. This rejection is respectfully traversed based on the claim amendments included herein. The Examiner is urged to enter these amendments which are supported by the previously submitted arguments filed on 14 February 2002. The limitation of eliminating alternate rows and then

selectively preserving certain pixels from such eliminated rows in order to avoid losing important parts of an image or figure printed on asymmetrical sub-pixels has now been incorporated into the claims.

Contrary to the Examiner's characterization, Towery does not incorporate a repeated pattern of asymmetrical sub-pixels. The confusing reference in column 2, lines 3-10 for a 600/300 pixel grid relates only to the problem of enlarged "drop size", and a clear understanding of the 600/600 symmetrical pixel grid of Towery is explained in column 2, lines 11-22:

"raster data at a particular resolution (e.g., 300x300 dpi) is scaled up to a higher resolution (e.g., 600x600 dpi) in such a manner that the expanded data includes a greater number of dot producing pixels to compensate for a dot size that is larger than the dot size that is appropriate for the higher resolution "

This is more fully explained beginning on line 17 of column 6 ("The minimum size of the 600x300 dot is related to the 600 dpi grid spacing S as follows.") See also the section entitled "Resolution Up Scaling" beginning on line 16, column 12 which states:

"Resolution expansion in accordance with the invention maps raster data at an original resolution to a higher resolution having twice the resolution in each axis (e.g., 300 dpi to 600 dpi)."

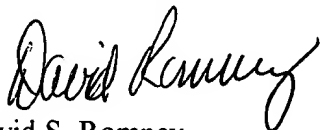
Thereafter "DOUBLE AXIS DOT DEPLETION" (see title) in Towery occurs in both the horizontal rows and the vertical columns in accordance with a horizontal depletion look-up table (see Fig. 9) and a complicated vertical depletion algorithm (see Fig. 10) There is no elimination of alternate rows to create the asymmetrical pixel grid of the present invention. The Examiner is respectfully requested to withdraw the Section 102 rejection based on the Towery Patent.

This amendment also adds new dependent claims 5 and 6 which are patentable over the prior art for the same reasons as stated above.

Finally this case has been amended to be a continuation-in-part of the previously copending Alfaro EDGE ENHANCEMENT DEPLETION TECHNIQUE Patent No. 6,296,343, and a duly executed Supplemental Declaration claiming priority will be promptly submitted from the co-inventors located in Spain.

In view of all the foregoing, the Examiner is earnestly requested to (1) enter this amendment, and (2) give favorable reconsideration and allowance to the remaining claims 1-6 as amended. Please contact the undersigned attorney for a telephone interview in the event that a further Examiner's Amendment might be needed to place this case in condition for allowance.

Respectfully submitted,



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Encl. Appendix showing claims as amended